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June 25, 2024

VIA ECF

Hon. Sidney H. Stein United States District Judge Southern District of New York 500 Pearl Street, Courtroom 23A New York, New York 10007 E. Anthony Figg George R. Repper Steven Lieberman Joseph A. Hvnds Martin M. Zoltick R. Danny Huntington Joo Mee Kim Brian S. Rosenbloom Jennifer P. Nock Richard Wydeven Sharon L. Davis Robert P. Parker Jenny L. Colgate Leo M. Loughlin Michael V. Battaglia Michael H. Jones Rachel M. Echols Daniel L. Shores Brett A. Postal Aydin H. Harston, Ph.D.

*Not a member of the D.C. Bar. Practice limited to patent, trademark and copyright matters and cases in federal courts. G. Franklin Rothwell (1928-2011)

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Re: Daily News, LP, et al. v. Microsoft Corporation, et al.

Case No.: 1:24-cv-03285-SHS

Dear Judge Stein,

I write on behalf of Plaintiffs pursuant to Rule 2.F of Your Honor's Individual Practices. Plaintiffs respectfully request oral argument on the OpenAI Defendants' partial motion to dismiss. Dkt. 80. Plaintiffs believe that oral argument will assist the court in segregating the non-pertinent factual allegations raised in the OpenAI Defendants' moving papers from the otherwise straightforward issues on which they have actually moved.

Respectfully submitted,

/s/ Steven Lieberman Steven Lieberman

cc: All Counsel of Record (via ECF)